

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

City of Rochester v. Purdue Pharma, L.P.,
No. 19-op-45853 (Track 12)

Lincoln County v. Richard S. Sackler, M.D.,
No. 20-op-45069 (Track 13)

City of Independence, Missouri v. Williams,
No. 19-op-45371 (Track 14)

*County of Webb, Texas v. Purdue Pharma,
L.P.*, No. 18-op-45175 (Track 15)

MDL NO. 2804

Case No. 17-MD-2804

Judge Dan Aaron Polster

DECLARATION OF SAGE R. VANDEN HEUVEL

I, Sage R. Vanden Heuvel, declare as follows:

1. I am an attorney at Quinn Emanuel Urquhart & Sullivan, LLP. I represent Express Scripts, Inc. in this litigation. I have personal knowledge of the matters stated herein; and, if called upon, I could and would competently testify thereto.

2. On March 12, 2024, while reviewing materials to ensure compliance with DR-22, I discovered a cover letter and subpoena from the City of Chicago Department of Law to Express Scripts, Inc. dated November 25, 2013. Attached hereto as **Exhibit A** is a true and correct copy of this cover letter and subpoena.

3. Based on further investigation, which remains ongoing, I have confirmed that at least one document production containing confidential materials was produced in response to this subpoena. These confidential materials included contracts with Purdue and minutes of the Express

Scripts Pharmacy & Therapeutics Committee relating to prescription opioids. The production was designated "Confidential." In addition, I have confirmed that Express Scripts conducted phone calls with an attorney at Cohen Milstein Sellers & Toll PLLC regarding confidential subjects, including rebate agreements and Express Scripts' formulary committees.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 13, 2024, at West Linn, Oregon.

Date: March 13, 2024

Respectfully submitted,


Sage R. Vanden Heuvel